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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

WILLIAMS MEARS, individually and as successor in interest to Michael Mears; and JOANNA WYSOCKI, individually and as successor in interest to Michael Mears,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a municipality; STEVEN BEUMER, an individual; JOSE PEDROZA, an individual; JONATHAN GAN, an individual; OFFICER SEFFEL, an individual; OFFICER LEW, an individual; OFFICER GIST, an individual; SGT. WILLIAMS, an individual; and DOES 8-10, inclusive.

Defendants.

CASE NO.: CV 15-08441 JAK (AJWx)
Consol. w/ CV 15-09586 JAK (AJWx)

[Assigned to the Hon. John A. Kronstadt,
United States District Judge]

**DECLARATION OF BRIAN T. DUNN
AND EXHIBITS 1-4 SUBMITTED IN
SUPPORT OF PLAINTIFFS' JOINT
MOTION IN LIMINE NO. 4 OF 4 TO
EXCLUDE CUMULATIVE EXPERT
TESTIMONY**

Hearing:

Date: April 17, 2017
Time: 3:00 p.m.
Place: Courtroom 10B

Trial:

Date: May 2, 2017
Time: 9:00 a.m.
Place: Courtroom 10B

DECLARATION OF BRIAN T. DUNN

I, Brian T. Dunn, declare and state as follows:

3 1. I am an attorney at law, duly licensed to practice before this Court and
4 all of the Courts of the State of California. I am a principal at The Cochran Firm
5 California, attorneys of record for Plaintiff WILLIAM MEARS in the above-entitled
6 action. If called upon to testify, I could and would competently testify to the
7 following facts, as the same are personally known to me, except as to those matters
8 that may be stated upon information and belief, and as to those matters, I believe the
9 same to be true.

10 2. Attached hereto as "Exhibit 1" is a true and correct copy of the Rule 26
11 Report of Gary Vilke, M.D., dated November 19, 2016.

12 3. Attached hereto as "Exhibit 2" is a true and correct copy of the Rule 26
13 Report of Charles Wetli, M.D., dated November 21, 2016.

14 4. Attached hereto as "Exhibit 3" is a true and correct copy of the Rule 26
15 Report of Richard Clark, M.D., dated November 19, 2016.

16 5. Attached hereto as "Exhibit 4" is a true and correct copy of the Rule 26
17 Report of Theodore Chan, M.D., dated November 17, 2016.

19 I declare under penalty of perjury under the laws of the United States of
20 America and the State of California that the foregoing is true and correct and that
21 this Declaration was executed this 3rd day of April, 2017, at Los Angeles,
22 California.

/s/ Brian T. Dunn

Brian T. Dunn, declarant